

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

**UNITED STATES OF AMERICA
PLAINTIFF**

v.

**BERNETTA WILLIS,
DEFENDANT**

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CR. NO. 2:06-CR-0071-MEF

MOTION TO CONTINUE

Comes now Defendant, Bernetta Willis, by and through her attorney of record, and moves the court to continue the trial of this case and in support thereof states as follows:

1. This matter is presently set for trial during the November 27, 2006 trial term.
2. On October 18th, Counsel for Defendant was served with a copy of a superceding indictment filed with the Court on October 11, 2006.
3. The superceding indictment alleges at least two new counts for which extensive discovery remains outstanding from the Government.
3. Defendant appeared for arraignment on October 18, 2006 at which time the Government represented to the Court that they agreed that a continuance would be necessary in order for counsel to provide proper representation on the new charges.
4. Defendant filed her Waiver of Speedy Trial Rights (*Doc #80*) in open court.

WHEREFORE, the above matters considered, Defendants prays this court continue the trial of this case.

Respectfully submitted this day, October 18, 2006.

/s/Timothy C. Halstrom
Timothy C. Halstrom
Bar Number HAL021
Attorney for Defendant Bernetta Willis

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CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2006, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all individuals as appropriate.

/s/Timothy C. Halstrom
Timothy C. Halstrom
Bar Number HAL021